

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

GINGER DAYTON, an individual,

Plaintiff,

v.

**J. B. HUNT TRANSPORT, INC., a
business or corporation; STEVEN CHAD
TAGGART, an individual, et al.,**

Defendants.

CIVIL ACTION NO.

CV-07-124

MOTION FOR PROTECTIVE ORDER

COME NOW the Defendants, J. B. HUNT TRANSPORT, INC., and STEVEN CHAD TAGGART, and move this Honorable Court to enter the enclosed Protective Order in compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

/s/ Christopher S. Rodgers

Christopher S. Rodgers, Esq.

Attorneys for Defendants,

**J. B. HUNT TRANSPORT, INC., and
STEVEN CHAD TAGGART**

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the above and foregoing on all counsel of record, by U.S. Mail, postage prepaid on this 24th day of July, 2007:

COUNSEL OF RECORD:

/s/ Christopher S. Rodgers

Of Counsel

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PROTECTIVE ORDER

Counsel for all parties are hereby granted the right, upon compliance with the applicable provisions of the Alabama Rules of Civil Procedure, to obtain from all health care providers and health plans all information relating to the past, present, or future physical condition of any individual who is a party to the case (or, the decedent of a party), as well as all information relating to the provision of health care to such individual and payment for the provision of such health care. This Protective Order is intended to help the parties and third parties who receive subpoenas from the parties comply with the requirements of the federal HIPAA Privacy Rules, 45 C.F.R. § 164.512 (3), AS A "QUALIFIED PROTECTIVE ORDER" UNDER THAT REGULATION. This Protective Order expressly authorizes disclosure of "Protected Health Information" as defined in the Privacy Rules by the parties and third parties to counsel for the parties, subject to timely objection to the notice provision of ARCP 34. The Parties and counsel for the Parties may use and disclose such information for the purpose of this proceeding only and are to return or destroy such information (including all copies made) at the end of this proceeding.

DONE and ORDERED this _____ day of _____, 2007.

FEDERAL JUDGE